

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JING ZHANG, WEI FAN, MINGLIAN ZHANG, AND	)	
JUN ZHOU,	)	
	)	
Plaintiffs	)	21-cv-01625 (GHW)(BCM)
v.	)	
	)	
XUEYUAN HAN, HANFOR HOLDINGS CO., LTD., HF	)	<b>DECLARATION OF</b>
HOLDINGS LIMITED., HANFOR CAPITAL	)	<b>WENNAN AO IN</b>
MANAGEMENT CO., LTD., NUOYUAN	)	<b>OPPOSITION TO</b>
CAPITALMANAGEMENT COMPANY LTD., GEORGE	)	<b>PLAINTIFFS’</b>
XU, JUNJUN FENG, WENNAN AO, BZ INDUSTRIAL	)	<b>APPLICATION FOR AN</b>
(CHINA), BZ INDUSTRIAL (VIRGIN ISLANDS), BZ	)	<b>ATTACHMENT</b>
INDUSTRIAL (CAYMAN ISLANDS), HANFOR	)	
(CAYMAN) LIMITED, HFRE LLC, HF CAPITAL	)	
MANAGEMENT CAY INC., HF COSMOPOLITAN BETA	)	
L.P., HENGTAI SECURITIES CO., LTD., JOHN DOES	)	
1-10, JANE DOES 1-10, AND ABC-XYZ CORP. 1-10,	)	
	)	
	)	
Defendants.	)	
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Wennan Ao hereby declares pursuant to 28 U.S.C. § 1746:

1. I am a defendant in this action. I submit this declaration in opposition to the plaintiffs’ order to show cause seeking an attachment against the defendants. This declaration is based on my personal knowledge.
2. I am a citizen and resident of the People’s Republic of China.
3. My ex-husband currently lives in the United States, and I came to the United States in December 2019 for the purpose of investigating educational opportunities for

my children and exploring business opportunities.

4. I expected to stay in New York for no more than two or three months beginning in December 2019. Due to the COVID-19 pandemic and related travel restrictions and concerns, however, I remained in New York for an additional five months.

5. I returned to China in early December 2020, and I have been in China and have not visited the United States since then.

6. During the approximately eleven months that I was in New York in late 2019 and 2020, I stayed at 377 Rector Place, Apartment 27B, in Manhattan. I do not own that property.

7. I currently work for Beijing Li Yang Exhibition Co., Ltd. From 2009 through 2019, I worked for China Packaging Federation, an industry group affiliated with the Chinese government/. Neither Mr. Han nor any of the other defendants work for or have ownership interests in either my current or former employer.

8. I do not have (and have never had) a direct or indirect ownership interest in Hanfor Holdings Co., Ltd., HF Holdings Limited, Hanfor Capital Management Co., LTD., Nuoyuan Capital Management Company LTD., BZ Industrial (CHINA), BZ Industrial (Virgin Islands), BZ Industrial (Cayman Islands), Hanfor (Cayman) Limited, HFRE LLC, HF Capital Management Cay Inc., HF Cosmopolitan Beta L.P., or Hengtai Securities Co., LTD. (collectively, the “Corporate Defendants”).

9. I am not (and have never been) a director, manager, officer, employee or general partner of any of the Corporate Defendants.

10. I have not entered into any contracts with any of the plaintiffs.

11. I have not had any direct communications with any of the plaintiffs.

12. Other than for the eleven months described above, I have never lived in New York or elsewhere in the United States, and I do not own any property in New York or elsewhere in the United States.

13. I am divorced from Xueyuan Han. Our divorce was finalized in 2018.

I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 19 , 2021

Wennan Ao

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Wennan Ao